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Tucson Electric Power Company

220 West Sixth Street, Post Office Box 711

Arizona Corporation Commission
Tucson, Arizona 85702

DOCKETED 520-884-3683

SEP 14 2000

DOCKETED BY  September 13, 2000

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2000 SEP 14 P 2:10

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Deborah Scott
Director, Utilities Division
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, AZ 85007-2996

E-00000A-00-0403

Re: Joint application of the Process Standardization Working Group
for variation/exemption of certain Requirements

Dear Ms. Scott:

Enclosed please find Ten (10) copies, plus one (1) original, of the Joint application of the Process Standardization Working Group (PSWG) for variation/exemption of certain requirements related to Arizona's electric competition rules.

Please contact me if you have any questions or comments.

Sincerely,



David Couture
Director, Regulatory Affairs

Cc: Evelyn Dryer
Joe King
Susan Lance

ORIGINAL

RECEIVED

BEFORE THE ARIZONA CORPORATION COMMISSION 2: 11

AZ CORP COMMISSION
DOCUMENT CONTROL

CARL J. KUNASEK

Chairman

JIM IRVIN

Commissioner

WILLIAM A. MUNDELL

Commissioner

IN THE MATTER OF COMPETITION IN THE)
PROVISION OF ELECTRIC SERVICES)
THROUGHOUT THE STATE OF ARIZONA.)

E-00000A-00-0403
DOCKET NO. RE-00000C-94-0165

**JOINT APPLICATION OF ARIZONA PUBLIC SERVICE COMPANY CITIZENS
UTILITIES COMPANY AND TUCSON ELECTRIC POWER COMPANY, AS MEMBERS
OF THE THE PROCESS STANDARDIZATION WORKING GROUP, FOR
VARIATION/EXEMPTION OF CERTAIN REQUIREMENTS OF A.A.C. R14-2-1615**

Pursuant to A.A.C. R14-2-1614(C), Arizona Public Service Company ("APS"), Citizens Utilities Company ("CZN"), and Tucson Electric Power Company ("TEP"), collectively referred to as "Parties" as members of the Process Standardization Working Group ("PSWG"), which includes the Arizona Corporation Commission Staff, APS Energy Services, Arizona Electric Power Cooperative, Arizona Public Service Company, Citizens Utilities Company, the City of Mesa, Computer Sciences Corporation, Energy Consulting & Design, EXCELERGY, GCSECA, K.R. Saline & Associates, Mohave Electric Cooperative, Navopache Electric Cooperative, New West Energy, Salt River Project, Sulphur Springs Valley Cooperative, TeledataFirstPoint, TRICO Electric Cooperative, and Tucson Electric Power Company. The Parties hereby jointly request the following variation/exemption from the provisions of A.A.C. R14-2-1615-B(1). Specifically, A.A.C. R14-2-1615-B(1) states that:

"This Section does not preclude an Affected Utility or Utility Distribution Company from billing its own customers for distribution service, or from providing billing services to Electric Service Providers in conjunction with its own billing, or from providing Meter Services and Meter Reading Services for Load Profiled residential

1 customers.”

2
3 APS, CZN, and TEP request that the Commission grant a waiver of R14-2-1615-B(1) in
4 order for all companies to apply the same standards to load-profiled commercial customers that are
5 currently prescribed by the Rules for load-profiled residential customers. A waiver/exemption of the
6 current Rule would allow APS, CZN, and TEP to provide the same service, contemplated by the
7 current Rule, to existing commercial customers, albeit either standard offer customers or those that
8 choose an alternative provider(s) for various services.

9
10 **GRANTING THE REQUESTED WAIVERS IS IN THE PUBLIC INTEREST**

11 The Commission has formed and participated in a number of work groups to establish
12 standards that foster and encourage competition. The current rule has the effect of preventing non-
13 residential load profiled customers from having a choice. Market participants agree that it is too
14 costly for alternative providers to read the meters for these customers and it is not cost effective to
15 replace the existing meters. That is why these non-residential customers were permitted by the rules
16 to be load profiled. The signatories in Attachment 1 respectively request this waiver. The signatories
17 in Attachment 2 unanimously approve the recommended variation/exemption to the Electric
18 Competition Rules pursuant to A.A.C. R14-2-1614(C).

19
20 RESPECTFULLY SUBMITTED this 13th day of September , 2000.
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ATTACHMENT 1 (Load Profiling)
JOINT WAIVER PARTICIPANTS

ARIZONA PUBLIC SERVICE

By: Jana Chan Vess
Title: Mgr. State Regulations

CITIZENS UTILITIES COMPANY

By: _____

Title: _____

TUCSON ELECTRIC POWER
COMPANY

By: _____

Title: _____

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ATTACHMENT 1 (Load Profiling)
JOINT WAIVER PARTICIPANTS

ARIZONA PUBLIC SERVICE

By: _____

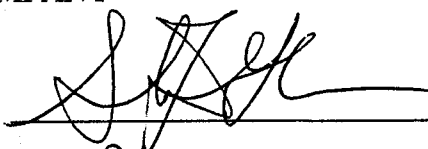
Title: _____

CITIZENS UTILITIES COMPANY

By: _____

Title: _____

TUCSON ELECTRIC POWER
COMPANY

By:  _____

Title: VP _____

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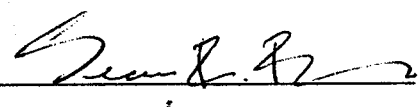
ATTACHMENT 1 (Load Profiling)
JOINT WAIVER PARTICIPANTS

ARIZONA PUBLIC SERVICE

By: _____

Title: _____

CITIZENS UTILITIES COMPANY

By: 

Title: DIRECTOR, ENERGY SERVICES

TUCSON ELECTRIC POWER
COMPANY

By: _____

Title: _____

ATTACHMENT 2(Load Profiling)
PROCESS STANDARDIZATION WORKING GROUP

APS ENERGY SERVICES

By:

Barbara P. Kline

Title:

Director, Regulatory Affairs

ARIZONA ELECTRIC POWER
COOPERATIVE

By:

Barbara Kline

Title:

Director, Regulatory Affairs

COMPUTER SCIENCES CORP

By:

Title:

ENERGY CONSULTING & DESIGN

By:

Title:

EXCELERGY

By:

Title:

GCSECA

By:

Title:

MOHAVE ELECTRIC COOPERATIVE

By:

Title:

NEW WEST ENERGY

By:

Title:

NAVAPACHE ELECTRIC
COOPERATIVE

By:

Title:

SULPHUR SPRINGS VALLEY
ELECTRIC COOPERATIVE

BY:

Title:

ATTACHMENT 2(Load Profiling)
PROCESS STANDARDIZATION WORKING GROUP

APS ENERGY SERVICES

By: _____

Title: _____

ARIZONA ELECTRIC POWER
COOPERATIVE

By: _____

Title: _____

COMPUTER SCIENCES CORP

By: _____

Title: _____

ENERGY CONSULTING & DESIGN

By: _____

Title: _____

EXCELERGY

By: _____

Title: _____

GCSECA

By: _____

Title: _____

MOHAVE ELECTRIC COOPERATIVE

By: _____

Title: _____

NEW WEST ENERGY

By: _____

Title: _____

NAVAJO PACHE ELECTRIC
COOPERATIVE

By: Dennis M. Hughes

Title: MGR. OF ENERGY SERVICES

SULPHUR SPRINGS VALLEY
ELECTRIC COOPERATIVE

BY: _____

Title: _____

ATTACHMENT 2(Load Profiling)
PROCESS STANDARDIZATION WORKING GROUP

APS ENERGY SERVICES

By: _____

Title: _____

ARIZONA ELECTRIC POWER
COOPERATIVE

By: _____

Title: _____

COMPUTER SCIENCES CORP

By: _____

Title: _____

ENERGY CONSULTING & DESIGN

By: _____

Title: _____

EXCELERGY

By: _____

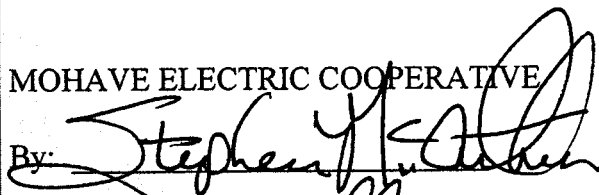
Title: _____

GCSECA

By: _____

Title: _____

MOHAVE ELECTRIC COOPERATIVE

By: 

Title: Controller

NEW WEST ENERGY

By: _____

Title: _____

NAVAPACHE ELECTRIC
COOPERATIVE

By: _____

Title: _____

SULPHUR SPRINGS VALLEY
ELECTRIC COOPERATIVE

BY: _____

Title: _____

ATTACHMENT 2(Load Profiling)
PROCESS STANDARDIZATION WORKING GROUP

APS ENERGY SERVICES

By: _____

Title: _____

ARIZONA ELECTRIC POWER
COOPERATIVE

By: _____

Title: _____

COMPUTER SCIENCES CORP

By: _____

Title: _____

ENERGY CONSULTING & DESIGN

By: _____

Title: _____

EXCELERGY

By: _____

Title: _____

GCSECA

By: _____

Title: _____

MOHAVE ELECTRIC COOPERATIVE

By: _____

Title: _____

NEW WEST ENERGY

By: CA

Title: Director Legislative
Marketing

NAVAPACHE ELECTRIC
COOPERATIVE

By: _____

Title: _____

SULPHUR SPRINGS VALLEY
ELECTRIC COOPERATIVE

BY: _____

Title: _____

ATTACHMENT 2(Load Profiling)
PROCESS STANDARDIZATION WORKING GROUP

APS ENERGY SERVICES

By: _____

Title: _____

ARIZONA ELECTRIC POWER
COOPERATIVE

By: _____

Title: _____

COMPUTER SCIENCES CORP

By: _____

Title: _____

ENERGY CONSULTING & DESIGN

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Title: _____

EXCELERGY

By: _____

Title: _____

GCSECA

By: _____

Title: _____

MOHAVE ELECTRIC COOPERATIVE

By: _____

Title: _____

NEW WEST ENERGY

By: _____

Title: _____

NAVAPACHE ELECTRIC
COOPERATIVE

By: _____

Title: _____

SULPHUR SPRINGS VALLEY
ELECTRIC COOPERATIVE

BY:  _____

CREDEN W. HUBER
Title: CHIEF EXECUTIVE OFFICER

ATTACHMENT 2(Load Profiling)
PROCESS STANDARDIZATION WORKING GROUP

TEL DATA FIRST POINT

By: _____

Title: _____

TRICO ELECTRIC COOPERATIVE

By: Charles W. Emerson

Title: Manager of Tech Services

ORIGINAL

RECEIVED

BEFORE THE ARIZONA CORPORATION COMMISSION

2000 SEP 14 P 2:11

CARL J. KUNASEK

Chairman

JIM IRVIN

Commissioner

WILLIAM A. MUNDELL

Commissioner

AZ CORP COMMISSION
DOCUMENT CONTROL

IN THE MATTER OF COMPETITION IN THE)
PROVISION OF ELECTRIC SERVICES)
THROUGHOUT THE STATE OF ARIZONA.)

E-00000A-00-0403

~~DOCKET NO. RE-00000C-94-0165~~

**JOINT APPLICATION OF THE PROCESS STANDARDIZATION WORKING GROUP
FOR VARIATION/EXEMPTION OF CERTAIN REQUIREMENTS OF A.A.C. R14-2-1612**

Pursuant to A.A.C. R14-2-1614(C), APS Energy Services, Arizona Electric Power Cooperative, Arizona Public Service Company, Citizens Utilities Company, Mohave Electric Cooperative, Navopache Electric Cooperative, New West Energy, Sulphur Springs Valley Cooperative, Teledata First Point, TRICO Electric Cooperative, and Tucson Electric Power Company, collectively referred to as "Parties" as members of the Process Standardization Working Group ("PSWG"), which includes APS Energy Services, Arizona Electric Power Cooperative, Arizona Public Service Company, Citizens Utilities Company, the City of Mesa, Computer Sciences Corporation, Energy Consulting & Design, EXCELERGY, GCSECA, Mohave Electric Cooperative, Navopache Electric Cooperative, New West Energy, Salt River Project, Sulphur Springs Valley Cooperative, TeledataFirstPoint, TRICO Electric Cooperative, and Tucson Electric Power Company, hereby jointly request the following variation/exemption from the provisions of A.A.C. R14-2-210-(B)2 and A.A.C. R-14-2-1612(N). Specifically, A.A.C. R14-2-210- (B) 2 and A.A.C. R-14-2-1612 (N) require that certain elements of "rates and charges" be itemized on a customer's bill. A.A.C. R14-2-210- (B) 2 essentially refers to A.A.C. R-14-2-1612 (N), which prescribes those items that, must be included on a customer's bill. It is the consensus of the PSWG, that all entities regardless of status (i.e., Affected Utilities, Energy Service Providers, Meter Service Providers, etc.), be required to provide specific line items identifying all components of a customer's bill for which that entity provides service. To the extent that various entities are not providing those services outlined in

1 A.A.C. R14-2-1612 (N), the PSWG respectfully requests that the billing entities not be required to
2 enumerate specific line items for services that they do not provide.

3
4 **GRANTING THE REQUESTED WAIVERS IS IN THE PUBLIC INTEREST**

5 The Commission has formed and participated in a number of work groups to establish
6 standards that foster and encourage competition. The signatories in Attachment 1, collectively
7 known as the Process Standardization Working Group ("PSWG"), unanimously approve the
8 recommended variation/exemption to the Electric Competition Rules pursuant to A.A.C. R14-2-
9 1614(C).

10
11
12 **RESPECTFULLY SUBMITTED** this 13th day of September 2000.
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ATTACHMENT 1 (Billing items)
JOINT WAIVER PARTICIPANTS

ARIZONA PUBLIC SERVICE
COMPANY

APS ENERGY SERVICES

By: Jana Van Ness

By: _____

Title: Mgr. State Regulation

Title: _____

ARIZONA ELECTRIC POWER
COOPERATIVE

CITIZENS UTILITIES COMPANY

By: _____

By: _____

Title: _____

Title: _____

MOHAVE ELECTRIC COOPERATIVE

NEW WEST ENERGY

By: _____

By: _____

Title: _____

Title: _____

NAVOPACHE ELECTRIC
COOPERATIVE

SULPHUR SPRINGS VALLEY ELECTRIC
COOPERATIVE

By: _____

By: _____

Title: _____

Title: _____

TELDATAFIRST POINT

TRICO ELECTRIC COOPERATIVE

By: _____

By: _____

Title: _____

Title: _____

TUCSON ELECTRIC POWER
COMPANY

By: _____

Title: _____

ATTACHMENT 1 (Billing items)
JOINT WAIVER PARTICIPANTS

ARIZONA PUBLIC SERVICE
COMPANY

By: _____

Title: _____

APS ENERGY SERVICES

By: Barbara H. Hendrix

Title: Director, Regulatory Affairs

ARIZONA ELECTRIC POWER
COOPERATIVE

By: _____

Title: _____

CITIZENS UTILITIES COMPANY

By: _____

Title: _____

MOHAVE ELECTRIC COOPERATIVE

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By: _____

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ARIZONA PUBLIC SERVICE
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APS ENERGY SERVICES

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SULPHUR SPRINGS VALLEY ELECTRIC
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By: _____

Title: _____

TELDATAFIRST POINT

By: _____

Title: _____

TRICO ELECTRIC COOPERATIVE

By: Charles Emerson

Title: Manager of Tech Services

TUCSON ELECTRIC POWER
COMPANY

By: _____

Title: _____

ATTACHMENT 1 (Billing items)
JOINT WAIVER PARTICIPANTS

ARIZONA PUBLIC SERVICE
COMPANY

By: _____

Title: _____

APS ENERGY SERVICES

By: _____

Title: _____

ARIZONA ELECTRIC POWER
COOPERATIVE

By: _____

Title: _____

CITIZENS UTILITIES COMPANY

By: 

Title: DIRECTOR, ENERGY SERVICES

MOHAVE ELECTRIC COOPERATIVE

By: _____

Title: _____

NEW WEST ENERGY

By: _____

Title: _____

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Title: _____

TUCSON ELECTRIC POWER
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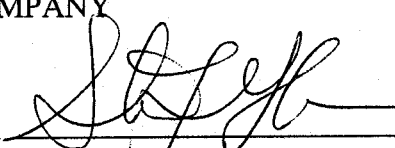
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TRICO ELECTRIC COOPERATIVE

By: _____

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TUCSON ELECTRIC POWER
COMPANY

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Title:  _____

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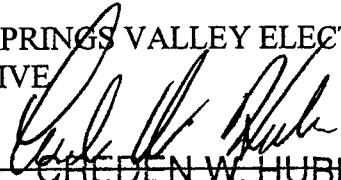
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NAVOPACHE ELECTRIC
COOPERATIVE

By: _____

Title: _____

SULPHUR SPRINGS VALLEY ELECTRIC
COOPERATIVE

By: 
CHREDEN W. HUBER
CHIEF EXECUTIVE OFFICER

Title: _____

TELDATAFIRST POINT

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TRICO ELECTRIC COOPERATIVE

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ATTACHMENT 1 (Billing items)
JOINT WAIVER PARTICIPANTS

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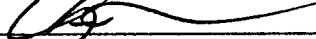
Title: _____

MOHAVE ELECTRIC COOPERATIVE

By: _____

Title: _____

NEW WEST ENERGY

By:  _____

Title: *Director Competitive Marketing*

NAVOPACHE ELECTRIC
COOPERATIVE

By: _____

Title: _____

SULPHUR SPRINGS VALLEY ELECTRIC
COOPERATIVE

By: _____

Title: _____

TELDATAFIRST POINT

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TRICO ELECTRIC COOPERATIVE

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TUCSON ELECTRIC POWER
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Title: _____

ATTACHMENT 1 (Billing items)
JOINT WAIVER PARTICIPANTS

ARIZONA PUBLIC SERVICE
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APS ENERGY SERVICES

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ARIZONA ELECTRIC POWER
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CITIZENS UTILITIES COMPANY

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MOHAVE ELECTRIC COOPERATIVE

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COMPANY

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ATTACHMENT 1 (Billing items)
JOINT WAIVER PARTICIPANTS

ARIZONA PUBLIC SERVICE
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APS ENERGY SERVICES

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ARIZONA ELECTRIC POWER
COOPERATIVE

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Title: _____

MOHAVE ELECTRIC COOPERATIVE

By: _____

Title: _____

NEW WEST ENERGY

By: _____

Title: _____

NAVOPACHE ELECTRIC
COOPERATIVE

By: Dennis W. Hughes

Title: MGR. OF ENERGY
SERVICES

TEL DATA FIRST POINT

By: _____

Title: _____

SULPHUR SPRINGS VALLEY ELECTRIC
COOPERATIVE

By: _____

Title: _____

TRICO ELECTRIC COOPERATIVE

By: _____

Title: _____

TUCSON ELECTRIC POWER
COMPANY

By: _____

Title: _____

RECEIVED

BEFORE THE ARIZONA CORPORATION COMMISSION

2000 SEP 14 P 2:12

CARL J. KUNASEK

Chairman

JIM IRVIN

Commissioner

WILLIAM A. MUNDELL

Commissioner

AZ CORP COMMISSION
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IN THE MATTER OF COMPETITION IN THE)
 PROVISION OF ELECTRIC SERVICES)
 THROUGHOUT THE STATE OF ARIZONA.)

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E-00000A-00-0403

**JOINT APPLICATION OF THE PROCESS STANDARDIZATION WORKING GROUP
 FOR VARIATION/EXEMPTION OF CERTAIN REQUIREMENTS OF A.A.C. R14-2-1612**

Pursuant to A.A.C. R14-2-1614(C), APS Energy Services, Arizona Electric Power Cooperative, Arizona Public Service Company, Citizens Utilities Company, Mohave Electric Cooperative, Navopache Electric Cooperative, New West Energy, Sulphur Springs Valley Cooperative, Teledata First Point, TRICO Electric Cooperative, and Tucson Electric Power Company, collectively referred to as "Parties" as members of the Process Standardization Working Group ("PSWG"), which includes APS Energy Services, Arizona Electric Power Cooperative, Arizona Public Service Company, Citizens Utilities Company, the City of Mesa, Computer Sciences Corporation, Energy Consulting & Design, EXCELERGY, GCSECA, Mohave Electric Cooperative, Navopache Electric Cooperative, New West Energy, Salt River Project, Sulphur Springs Valley Cooperative, TeledataFirstPoint, TRICO Electric Cooperative, and Tucson Electric Power Company, the parties hereby jointly request the following variation/exemption from the provisions of A.A.C. R14-2-1612-K12. Specifically, A.A.C. R14-2-1612-K12 requires that, "North American Electric Reliability Council recognized holidays will be used in calculating "working days" for meter data timeliness requirements." The parties requests that A.A.C. R14-2-1612-K12 be modified such that holidays be recognized on the days that they are officially observed. For example, if a holiday officially occurs on a Saturday, the preceding Friday will be recognized as the date of the holiday. Likewise, if a holiday officially occurs on Sunday, the date of observance will be the following

1 Monday.

2
3 **GRANTING THE REQUESTED WAIVERS IS IN THE PUBLIC INTEREST**

4 The Commission has formed and participated in a number of work groups to establish
5 standards that foster and encourage competition. Recognizing holidays on the day they are officially
6 observed will ensure consistency between all market participants in the calculation of working days
7 for any processes with specific time requirements. The signatories in Attachment 1 respectively
8 request this waiver. The signatories in Attachment 2 unanimously approve the recommended
9 variation/exemption to the Electric Competition Rules pursuant to A.A.C. R14-2-1614(C).

10 **RESPECTFULLY SUBMITTED** this 13th day of September , 2000.
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ATTACHMENT 1 (Workdays)
JOINT WAIVER PARTICIPANTS

ARIZONA PUBLIC SERVICE
COMPANY

APS ENERGY SERVICES

By: Jana Van Ness

By: _____

Title: Mgr. State Regulations

Title: _____

ARIZONA ELECTRIC POWER
COOPERATIVE

CITIZENS UTILITIES COMPANY

By: _____

By: _____

Title: _____

Title: _____

MOHAVE ELECTRIC COOPERATIVE

NEW WEST ENERGY

By: _____

By: _____

Title: _____

Title: _____

NAVOPACHE ELECTRIC
COOPERATIVE

SULPHUR SPRINGS VALLEY ELECTRIC
COOPERATIVE

By: _____

By: _____

Title: _____

Title: _____

TELDATAFIRST POINT

TRICO ELECTRIC COOPERATIVE

By: _____

By: _____

Title: _____

Title: _____

TUCSON ELECTRIC POWER
COMPANY

By: _____

Title: _____

ATTACHMENT 1 (Workdays)
JOINT WAIVER PARTICIPANTS

ARIZONA PUBLIC SERVICE
COMPANY

APS ENERGY SERVICES

By: _____

By: _____

Title: _____

Title: _____

ARIZONA ELECTRIC POWER
COOPERATIVE

CITIZENS UTILITIES COMPANY

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By: _____

Title: _____

Title: _____

TUCSON ELECTRIC POWER
COMPANY

By:  _____

Title: VPO _____

ATTACHMENT 1 (Workdays)
JOINT WAIVER PARTICIPANTS

ARIZONA PUBLIC SERVICE
COMPANY

By: _____

Title: _____

APS ENERGY SERVICES

By: _____

Title: _____

ARIZONA ELECTRIC POWER
COOPERATIVE

By: _____

Title: _____

CITIZENS UTILITIES COMPANY

By: _____

Title: _____

MOHAVE ELECTRIC COOPERATIVE

By:  _____

Title:  _____

NEW WEST ENERGY

By: _____

Title: _____

NAVOPACHE ELECTRIC
COOPERATIVE

By: _____

Title: _____

SULPHUR SPRINGS VALLEY ELECTRIC
COOPERATIVE

By: _____

Title: _____

TELDATAFIRST POINT

By: _____

Title: _____

TRICO ELECTRIC COOPERATIVE

By: _____

Title: _____

TUCSON ELECTRIC POWER
COMPANY

By: _____

Title: _____

ATTACHMENT 1 (Workdays)
JOINT WAIVER PARTICIPANTS

ARIZONA PUBLIC SERVICE
COMPANY

By: _____

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APS ENERGY SERVICES

By: _____

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ARIZONA ELECTRIC POWER
COOPERATIVE

By: _____

Title: _____

CITIZENS UTILITIES COMPANY

By: _____

Title: _____

MOHAVE ELECTRIC COOPERATIVE

By: _____

Title: _____

NEW WEST ENERGY

By: CA

Title: Director Competitive marketing

NAVOPACHE ELECTRIC
COOPERATIVE

By: _____

Title: _____

SULPHUR SPRINGS VALLEY ELECTRIC
COOPERATIVE

By: _____

Title: _____

TELDATAFIRST POINT

By: _____

Title: _____

TRICO ELECTRIC COOPERATIVE

By: _____

Title: _____

TUCSON ELECTRIC POWER
COMPANY

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ARIZONA PUBLIC SERVICE
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MOHAVE ELECTRIC COOPERATIVE

By: _____

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NEW WEST ENERGY

By: _____

Title: _____

NAVOPACHE ELECTRIC
COOPERATIVE

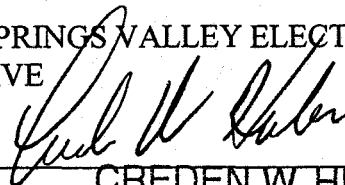
By: _____

Title: _____

SULPHUR SPRINGS VALLEY ELECTRIC
COOPERATIVE

By: _____

Title: _____



CREDEN W. HUBER
CHIEF EXECUTIVE OFFICER

TELDATAFIRST POINT

By: _____

Title: _____

TRICO ELECTRIC COOPERATIVE

By: _____

Title: _____

TUCSON ELECTRIC POWER
COMPANY

By: _____

Title: _____

ATTACHMENT 1 (Workdays)
JOINT WAIVER PARTICIPANTS

ARIZONA PUBLIC SERVICE
COMPANY

APS ENERGY SERVICES

By: _____

By: _____

Title: _____

Title: _____

ARIZONA ELECTRIC POWER
COOPERATIVE

CITIZENS UTILITIES COMPANY

By: _____

By: Sam R. Arz

Title: _____

Title: DIRECTOR, ENERGY SERVICES

MOHAVE ELECTRIC COOPERATIVE

NEW WEST ENERGY

By: _____

By: _____

Title: _____

Title: _____

NAVOPACHE ELECTRIC
COOPERATIVE

SULPHUR SPRINGS VALLEY ELECTRIC
COOPERATIVE

By: _____

By: _____

Title: _____

Title: _____

TELDATAFIRST POINT

TRICO ELECTRIC COOPERATIVE

By: _____

By: _____

Title: _____

Title: _____

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COMPANY

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Title: _____

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JOINT WAIVER PARTICIPANTS

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COMPANY

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NEW WEST ENERGY

By: _____

Title: _____

NAVOPACHE ELECTRIC
COOPERATIVE

By: _____

Title: _____

SULPHUR SPRINGS VALLEY ELECTRIC
COOPERATIVE

By: _____

Title: _____

TELDATAFIRST POINT

By: _____

Title: _____

TRICO ELECTRIC COOPERATIVE

By: Charles Emerson

Title: Manager of Tech Services

TUCSON ELECTRIC POWER
COMPANY

By: _____

Title: _____

ATTACHMENT 1 (Workdays)
JOINT WAIVER PARTICIPANTS

ARIZONA PUBLIC SERVICE
COMPANY

By: _____

Title: _____

APS ENERGY SERVICES

By: _____

Title: _____

ARIZONA ELECTRIC POWER
COOPERATIVE

By: _____

Title: _____

CITIZENS UTILITIES COMPANY

By: _____

Title: _____

MOHAVE ELECTRIC COOPERATIVE

By: _____

Title: _____

NEW WEST ENERGY

By: _____

Title: _____

NAVOPACHE ELECTRIC
COOPERATIVE

By: Dennis W. Hylor

Title: MGR. OF ENERGY
SERVICES

SULPHUR SPRINGS VALLEY ELECTRIC
COOPERATIVE

By: _____

Title: _____

TELDATAFIRST POINT

By: _____

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TRICO ELECTRIC COOPERATIVE

By: _____

Title: _____

TUCSON ELECTRIC POWER
COMPANY

By: _____

Title: _____

ATTACHMENT 1 (Workdays)
JOINT WAIVER PARTICIPANTS

ARIZONA PUBLIC SERVICE
COMPANY

By: _____

Title: _____

APS ENERGY SERVICES

By: Barbara H. Lenth

Title: Director, Regulatory Affairs

ARIZONA ELECTRIC POWER
COOPERATIVE

By: _____

Title: _____

CITIZENS UTILITIES COMPANY

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